

IRON MOUNTAIN INCORPORATED;
et al.

Plaintiffs,

v.

THOMAS CARR,

Defendant

And

THOMAS CARR,

Counter-Plaintiff

v.

IRON MOUNTAIN INCORPORATED;
IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.; C. RICHARD
REESE; JOHN F. KENNY, JR.; GARRY
B. WATZKE; LARRY L. VARN; AND
CHARLES G. MOORE,

Counter-Defendants

Civil Action No.

05 10890 RCL

**DEFENDANT'S AND COUNTER-PLAINTIFF'S CERTIFICATION PURSUANT
TO RULE 7.1 (a)(2) OF THE LOCAL RULES OF THE UNITED STATES
DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS**

The Defendant, Thomas Carr, by his undersigned counsel, herewith certifies that, regarding the Motion for Leave of Court to File a Second Amended Counter-Claim:

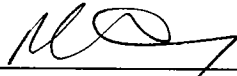
1. That on the afternoon of June 7, 2005 undersigned counsel communicated with counsel for the Plaintiffs and Counter-Defendants that it was their intention to file said Motion for Leave and that undersigned counsel looked forward to learning whether or not said motion would be agreed to or opposed.

2. Thereafter, undersigned counsel forwarded counsel for the Plaintiffs' and Counter-Defendants a copy of the proposed Second Amended Counter-Claim and opposing counsel agreed to respond to the inquiry by the close of business on June 8, 2005.
3. Counsel for Plaintiffs and Counter-Defendants advised today that while they continued to review the proposed Second Amended Complaint draft, that they would not be able to respond to undersigned counsel's inquiry as planned but they stipulate and agree that Local Rule 7.1 (a)(2) has been satisfied.
4. Therefore, undersigned counsel certifies that the requirements of Local Rule 7.1 (a)(2) have been met.

June 9, 2005

Respectfully submitted,

By his attorneys,



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